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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) CASE NO. 4:23-cr-00264 JSW

Plaintiff, } **JOINT STATUS REPORT**

V.

PATRICK JAMES BERHAN,  
MORTEZA AMIRI,  
AMANDA CARMELLA THEODOSY,  
SAMANTHA GENOVEVA PETERSON,  
ERNESTO JUAN MEJIA-OROZCO, and  
BRAULI RODRIGUEZ JALAPA,

### Defendants.

This matter is set for status conference hearings on January 30, 2024 (as to Defendants Amiri, Theodosy, and Mejia-Orozco) and February 13, 2024 (as to Defendants Berhan and Rodriguez). The Court has ordered the parties to submit a joint status report by January 23, 2024. Dkt. 98. The parties hereby respectfully submit this joint status report.

On August 16, 2023, a federal grand jury returned an indictment charging the Defendants with

1 conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, and wire fraud, in violation of 18  
 2 U.S.C. § 1343. Defendant PETERSON entered a guilty plea on January 9, 2024.

3 In September, the United States produced a first tranche of discovery for all defendants except  
 4 Defendant AMIRI, who was not yet represented by counsel and did not yet have a protective order in  
 5 place. In October, once counsel for Defendant AMIRI appeared and a protective order was issued, the  
 6 United States produced its first tranche of discovery to Defendant AMIRI. In November, the United  
 7 States produced its second tranche of discovery, which comprised “pertinent” phone data seized by law  
 8 enforcement agents pursuant to search warrants, to all defendants. In December, new counsel was  
 9 appointed to represent Defendant AMIRI. At the end of December, the United States produced a third  
 10 tranche of discovery to all defendants, with the exception of Defendant AMIRI. Defendant AMIRI’s  
 11 new counsel filed a notice acknowledging the protective order on January 11, 2024, and the government  
 12 subsequently produced the discovery to date to Defendant AMIRI’s new counsel. Counsel for  
 13 Defendant MEJIA-OROZCO has also provided a hard drive to the FBI so that a full forensic image of  
 14 his own client’s phone can be copied for him by the FBI’s Silicon Valley Regional Computer Forensics  
 15 Laboratory, a process that is in progress.<sup>1</sup>

16 .

17 DATED: January 23, 2024

Respectfully submitted,

18 ISMAIL J. RAMSEY  
 19 United States Attorney

20 \_\_\_\_\_  
 21 /s/  
 22 ERIC CHENG  
 AJAY KRISHNAMURTHY  
 ALETHEA SARGENT  
 Assistant United States Attorneys

23 \_\_\_\_\_  
 24 /s/  
 25 EDWARD ROBINSON  
 NANCY KARDON  
 26 Counsel for Defendant PATRICK JAMES  
 BERHAN

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 28 <sup>1</sup> As noted above, the government has already produced materials from these devices that were  
 seized by law enforcement agents pursuant to search warrants.

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/s/

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/s/

PAUL GOYTEE  
Counsel for Defendant AMANDA  
CARMELLA THEODOSY

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/s/  
STEVE KALAR  
MICHAEL HINCKLEY  
Counsel for Defendant ERNESTO JUAN  
MEJIA-OROZCO

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/s/  
ADAM PENNELLA  
Counsel for Defendant BRAULI  
RODRIGUEZ JALAPA